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**Aaron G. Carlson**  
Senior Attorney



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February 17, 2004

PRIVILEGED AND CONFIDENTIAL  
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VIA FACSIMILE (214) 665.6660  
AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Janice Bivens  
Enforcement Officer  
Super Fund Cost Recovery Section (6SF-AC)  
United States Environmental Protection Agency  
Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Re: Request for Information Gulfco Marine Maintenance, Inc.

Dear Ms. Bivens:

Enclosed is the response of Noble Energy Inc. ("Noble") to that certain USEPA Information Request dated November 20, 2003 regarding Gulfco Marine Maintenance, Inc. This response is submitted on behalf of Samedan Oil Corporation ("Samedan") by Noble as successor by merger to Samedan. While Noble has undertaken reasonable due diligence in determining information within its possession, custody or control, Noble reserves the right to supplement its response should it discover additional information. Noble objects to Instruction 3 that would require it to seek out responsive information from former employees and agents.

Noble also objects to Question B3 in that it is overly broad and unreasonably burdensome. Noble operated in many states throughout the country and would have innumerable federal, state and local permits, identification numbers and/or registrations for storage, transport and/or disposal of materials, including air permits, disposal well permits, retention pit permits, wetland permits, etc. A response to Question B3 has been provided which is limited to federal, state and local permits, identification

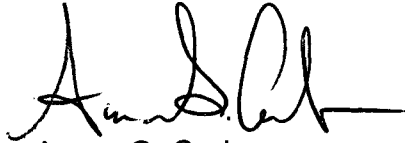


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Ms. Janice Bivens  
February 17, 2004  
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numbers, and/or registrations issued to Noble's operations in Texas and Louisiana for the transport of materials.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron G. Carlson', with a long horizontal stroke extending to the right.

Aaron G. Carlson

AGC:dg

enclosure

cc: Pam Tullos  
Terry Webster  
Bob Stewart

NOBLE ENERGY, INC.  
RESPONSE TO  
USA EPA  
QUESTIONS  
GULFCO MARINE MAINTENANCE, INC.  
FREEPORT, TEXAS

A General Information Concerning Respondent

1. Provide the full legal name and mailing address of the Respondent.

Noble Energy, Inc., as successor by Merger to Samedan Oil Corporation  
100 Glenborough Drive, Suite 100  
Houston, Texas 77067-3610

2. For each person answering these questions on behalf of the Respondent, provide full name, title, business address, and business telephone and facsimile number.

Aaron G. Carlson, Senior Attorney

Terry Webster, Onshore Health, Environmental and Safety Coordinator

Pam Tullos, Division Environmental and Regulatory Affairs Supervisor

Telephone: 281.872.3100; Facsimile: 281.872.3111  
See address in response to question 1.

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number and facsimile number.

Aaron G. Carlson  
Noble Energy, Inc.  
100 Glenborough Drive, Suite 100  
Houston, Texas 77067-3610  
281.872.3354  
Fax: 281.872.3115

4. Please include a brief description of the nature and status of the Respondent's business relationship with Gulfco Inc., Gulfco Marine Maintenance, Inc., Fish Engineering and Construction, Inc., Chromolloy American, Hercules Marine Services Corporation, LDL Coastal Limited L.P., LDL Management LLC, and any other previous or current owner or operator of the site.

None, except that in 1997 on two occasions Hercules Marine Service cleaned cement from a tank on a vessel. No disposal resulted from this activity. The barite was returned to the rig for processing and the cement was given away for reuse.

**B. Specific Information Relating to Site Operations**

1. Identify all persons including the Respondent, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials, hazardous materials, hazardous substances, and/or hazardous wastes ("materials") from various facilities to the Site. This information shall identify and state, but not be limited to the following:

- a. The persons with whom the Respondent made such arrangements;
- b. The precise locations from which these materials originated;
- c. The nature, including the chemical content, characteristics, physical state (e.g., solid or liquid) and quality (e.g., volume or weight) of all materials involved in each such arrangement;
- d. All tests, analyses, analytical results, and manifests concerning each material involved in such transactions;
- e. The persons who selected the location to which the materials were to be disposed and/or treated. In particular, the persons who selected the Site as a location for disposal and/or treatment of the materials. This information shall include where these persons intended to have the materials involved in each arrangement treated or disposed and all evidence of their intent;
- f. The amount paid in connection with each such arrangement, the method of payment, and the identity of the persons involved in each payment transaction; and
- g. Provide contracts or other documents reflecting such arrangements for transportation, disposal, and/or treatment of materials.

Except as described in response to question A4, Samedan Oil Corporation did not arrange for any materials to be disposed or treated at or transported for disposal or treatment to the site. Unknown as to other persons.

2. Provide names, addresses, and telephone numbers of any individuals, including former employees, who may have knowledge of operations at the site.

Bob Bemis and Ronnie Broussard

See response to question A2 for address and telephone number

3. List all federal, state and local permits, identification numbers, and/or registrations issued to the Respondent's operation for the storage, transport, and/or disposal of materials. Include respective permit numbers.

- Texas Conditionally Exempt Small Quantity Generator
- Louisiana waste generator nos. N205585; N201397; NO19; and 5264
- Louisiana Department of Environmental Quality General License Nos. for NORM disposal: LA-5264-N01 and N201397

4. Provide names and addresses for all carriers who transported materials on behalf of Respondent to hazardous waste treatment, storage, or disposal facilities permitted by EPA or the State.

Phillips Services 5151 San Felipe, Suite 1600, Houston, Texas 77056

Allwaste Oilfield (Transport IC No. 225482), 138 Tiger Court Morgan City, LA 70380

Venture T Transport Inc. (Transport IC No. MC205656), Morgan City, LA (505) 631-3196

Garner Environmental (Transport IC No. 40725), 1717 W. 13<sup>th</sup> St. Deer Park, TX 77536

5. Identify whether a Notification of Hazardous Waste Activity was ever filed with the EPA or the corresponding agency or official of the State. This information shall include, but not be limited to, the following:

- a. The date of such filing; and
- b. The wastes described in such notice:
  - (1) The quantity of the wastes described in such notice; and
  - (2) The identification number assigned to such facility by EPA or the State.

On August 29, 1995, 22,000 lbs of NORM sludge was transported by Allwaste Environmental to New Park Disposal Facility in Port Arthur, Texas (Facility License No. L04708).

On May 1, 1995, 38,250 lbs of NORM sludge was transported by Venture Testers Inc. to Oil Field Testers in Louisiana (Facility No. LA6256501)

On June 23, 1995, 60 barrels of NORM sludge was transported by Garner Environmental to New Park Disposal facility in Port Arthur, Texas.

Samedan Oil Corporation has no further responsive information.

6. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

Samedan Oil Corporation filed SARA Title III hazardous substance reports with the Texas Commission on Environmental Quality, the Louisiana Department of Environmental Quality and other state agencies for each year starting in approximately 1989.